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February 28, 2022

VIA ECF

The Honorable John G. Koeltl United States District Court Southern District of New York 500 Pearl Street, Courtroom 14A New York, New York 10007 APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Peggy Calderon Trotman v. Delta Air Lines, Inc.

Docket No.: 1:21-cy-04441-JGK

Dear Judge Koeltl:

We represent Defendant, Delta Air Lines, Inc. ("Delta"), in connection with the above-referenced matter. We are writing on behalf of both parties to request a 60-day extension of time to complete discovery. This is the first request for an extension of time in this matter.

Currently, the deadline for all expert discovery is April 1, 2022 and the deadline for the filing dispositive motions is April 22, 2022. The parties are currently in the process of exchanging expert reports and scheduling the deposition of Delta. Therefore, the parties respectfully request that the deadline for all discovery be extended to June 1, 2022 and that the deadline to file dispositive motions be extended to June 22, 2022.

We thank Your Honor for consideration of the above.

Respectfully submitted

Michael J. Crowley

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia